

1 MICHELE BECKWITH
2 Acting United States Attorney
3 CHRISTINA McCALL
4 Assistant United States Attorney
5 501 I Street, Suite 10-100
6 Sacramento, CA 95814
7 Telephone: (916) 554-2700
8 Facsimile: (916) 554-2900

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11 Attorneys for Plaintiff
12 United States of America

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14 IN THE UNITED STATES DISTRICT COURT
15 EASTERN DISTRICT OF CALIFORNIA

16 UNITED STATES OF AMERICA,

CASE NO. 2:24-CR-0093 DC

17 Plaintiff,

STIPULATED REQUEST TO CONTINUE
18 HEARING AND EXCLUDE TIME PERIODS
19 UNDER SPEEDY TRIAL ACT; FINDINGS AND
20 ORDER

TREVOR CLAYTON MORGAN,

DATE: March 7, 2025

21 v.
Defendant.

TIME: 9:30 a.m.

22 COURT: Hon. Dena M. Coggins

23
24 STIPULATION

25 Plaintiff United States of America, by and through its counsel of record, and defendant, by and
26 through defendant's counsel of record, hereby stipulate as follows:

27 1. By previous order, this matter was set for status on March 7, 2025, with a time exclusion
28 for effective preparation of counsel.

29 2. The parties jointly request that the status conference be set for May 2, 2025, and request
30 to exclude time between March 7, 2025, and May 2, 2025 at 9:30 before the Honorable Dena Coggins,
31 under Local Code T4 and 18 U.S.C. §3161(h)(7)(A) and (h)(7)(B)(iv).

32 3. The parties agree and stipulate, and request that the Court find the following:

33 a) The government has represented that the discovery associated with this case
34 includes over 600 pages/items of discovery. Those items include: business records; investigative
35 reports; interviews; photographs; and search warrant documents. Additionally, defense counsel

1 has reviewed some of the digital evidence in the case at the U.S. Attorney's office. The
2 investigators in this case have submitted hundreds of files to the National Center for Missing and
3 Exploited Children and received the results in December of 2024. Counsel for multiple series
4 victims have begun submitting restitution requests to the government, which will impact the
5 judgment ultimately imposed in this case. The government received information pertaining to
6 NCMEC's designation of a new series in this case on February 24, 2025, and is conveying that
7 information to counsel for the defendant.

8 b) A continuance is requested because counsel for both parties need additional time
9 for effective preparation, to address restitution issues and perform necessary research to resolve
10 the case.

11 c) Counsel for defendant believes the failure to grant a continuance in this case
12 would deny defense counsel reasonable time necessary for effective preparation, taking into
13 account the exercise of due diligence.

14 d) The government joins in the request for the continuance.

15 e) Based on the above-stated findings, the ends of justice served by continuing the
16 case as requested outweigh the interest of the public and the defendant in a trial within the
17 original date prescribed by the Speedy Trial Act.

18 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
19 et seq., within which trial must commence, the time period of March 7, 2025 to May 2, 2025,
20 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]
21 because it results from a continuance granted by the Court at defendant's request on the basis of
22 the Court's finding that the ends of justice served by taking such action outweigh the best interest
23 of the public and the defendant in a speedy trial.

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: February 27, 2025

MICHELE BECKWITH
Acting United States Attorney

/s/ CHRISTINA McCALL
CHRISTINA McCALL
Assistant United States Attorney

Dated: February 27, 2025

/s/ NOA OREN
NOA OREN
Assistant Federal Public Defender
Counsel for Defendant
TREVOR CLAYTON MORGAN

ORDER

The court has read and considered the parties' Stipulation. The Court ORDERS that the status conference set for March 7, 2025 be continued to May 2, 2025 at 9:30 before the Honorable Dena Coggins. The court hereby finds that the Stipulation, which the court incorporates by reference into this Order, demonstrates facts that provide a basis to exclude time under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]. Time is excluded under the Speedy Trial Act between March 7, 2025, and May 2, 2025.

IT IS SO ORDERED.

Dated: **March 3, 2025**


Dena Coggins
United States District Judge